

892341/574-7207

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MURRAY RICHMAN :  
and RENEE RICHMAN, :

: Docket No.: 07 CIV 6255

Plaintiffs

: ANSWER

– against –

:

STONEBRIDGE CASUALTY :  
INSURANCE COMPANY, :

Defendant demands a jury trial.

Defendant.

:  
-----X

Defendant Stonebridge Casualty Insurance Company (“Stonebridge”) answers the  
Complaint as follows:

**Answering The Complaint**

1. Stonebridge admits paragraph 1 of the complaint.
2. Stonebridge denies paragraphs 2 and 3 of the complaint and admits that  
plaintiffs purchased a Travel Protection Plan (the “plan”) and refers to the plan for its terms.
3. Stonebridge denies paragraphs 4 through 7 of the complaint.

**First Affirmative Defense**

4. The complaint fails to state a basis for the recovery of punitive damages.

**Second Affirmative Defense**

5. The illness claimed by plaintiffs was a pre-existing condition under the plan  
for which plaintiffs are not covered.

**Third Affirmative Defense**

6. The complaint is barred by ratification, waiver and estoppel.

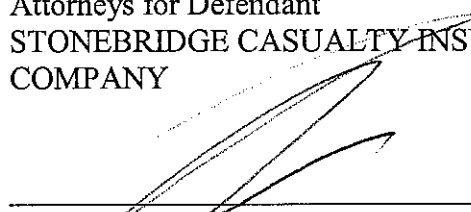
**Fourth Affirmative Defense**

7. The complaint is barred by the terms and conditions of the plan.

Wherefore, Stonebridge demands judgment dismissing the action, with costs and disbursements.

Dated: New York, New York  
July 9, 2007

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New York, NY 10271  
212 964-6611  
Attorneys for Defendant  
STONEBRIDGE CASUALTY INSURANCE  
COMPANY

  
\_\_\_\_\_  
Steven B. Getzoff (SBG-3455)

TO:

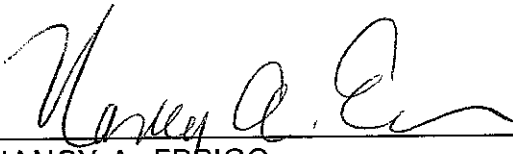
MICHAEL DREZIN, ESQ.  
25 Westchester Square  
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718 823-7211  
Attorney for Plaintiffs

Declaration of Service

I served the annexed ANSWER by first-class mail on the following persons on July 9, 2007:

MICHAEL DREZIN, ESQ.  
25 Westchester Square  
Bronx, NY 10461  
718-823-7211  
Attorneys for Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on July 9, 2007.

  
\_\_\_\_\_  
NANCY A. ERRIGO

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MURRAY RICHMAN  
and RENEE RICHMAN,

Plaintiff,

Docket No.: 07 CIV 6255  
Judge Koeltl

**ANSWER**

-against-

STONEBRIDGE CASUALTY INSURANCE  
COMPANY,

Defendant.  
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**LESTER SCHWAB KATZ & DWYER, LLP**

**ATTORNEYS FOR**

**Defendant**

**STONEBRIDGE CASUALTY INSURANCE  
COMPANY**

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